

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

G.K, by their next friend, Katherine Cooper, et al.

Plaintiffs,

V.

Christopher Sununu, in his official capacity
as the Governor of New Hampshire, et al.

Defendants.

Case No. 1:21-cv-0004

**DEFENDANTS' ASSENTED-TO MOTION FOR AN EXTENSION OF TIME
TO FILE A REQUEST FOR RECONSIDERATION**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants move for a five-day extension of the deadline to file a Request for Reconsideration of the Court’s Order of October 19, 2022 (“the Order”), Doc. No. 119.

On October 19, 2022, the Court ordered Defendants to produce documents responsive to Request Number 1 in Plaintiff’s Third Set of Requests for Production of Documents to DHHS, limited to “files” of “older foster youth with mental impairments, a record of such impairments or who are regarded as having such impairments, who have been placed in the legal custody of the New Hampshire Division of Children, Youth and Families (‘DCYF’) due to parental abuse or neglect” by December 1, 2022. *See* Doc. No. 119, at 13.

On November 3, 2022, the Court granted the Defendants’ assented to motion for a seven-day extension of the deadline for Defendants to request reconsideration of the Court’s Order, such that any request for reconsideration is now due on November 9, 2022 (today). *See* Doc. No. 122; Endorsed Order of Nov. 3, 2022.

The parties continue to work toward a compromise on whether the December 1, 2022

deadline for production will be extended. However, the parties request a few more days to see if they can come to an agreement on these issues because, if the parties can come to such an agreement, it may obviate the need for Defendants to request partial reconsideration of the Order with respect to December 1, 2022 deadline only.¹ This constitutes good cause for an extension of time.

Defendants have consulted with Plaintiffs' counsel, who have informed Defendants that Plaintiffs assent to the motion.

Respectfully submitted,

LORI SHIBINETTE, in her official capacity as
Commissioner of the New Hampshire Department of
Health and Human Services,

By their attorney,

JOHN M. FORMELLA
NEW HAMPSHIRE ATTORNEY GENERAL

Dated: November 9, 2022

By: /s/ Nathan W. Kenison-Marvin
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/s/ Philip Peisch

¹ An extension of this deadline would not result in the continuance of any hearing, conference, or trial. See L.R. 7.2(a).

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CERTIFICATE OF SERVICE

I, Philip Peisch, hereby certify that I caused a true and correct copy of the foregoing to be filed through the ECF system and served electronically on the registered participants as identified on the Notice of Electronic Filing.

November 9, 2022

/s/ Philip Peisch

Philip J. Peisch